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Jeffrey M. Nelson
Chief Legal Officer

December 10, 2018

VIA ELECTRONIC FILING

Jocelyn G. Boyd, Esquire
 Chief Clerk & Administrator
 Public Service Commission of South Carolina
 101 Executive Center Drive, Suite 100
 Columbia, South Carolina 29210

RE: **Docket No. 2017-370-E** – Joint Application and Petition of South Carolina Electric & Gas Company and Dominion Energy, Incorporated for Review and Approval of a Proposed Business Combination between SCANA Corporation and Dominion Energy, Incorporated, as May Be Required, and for a Prudency Determination Regarding the Abandonment of the V.C. Summer Units 2 & 3 Project and Associated Customer Benefits and Cost Recovery Plans

Docket No. 2017-207-E – Friends of the Earth and Sierra Club, Complainant/Petitioner v. South Carolina Electric & Gas Company, Defendant/Respondent

Docket No. 2017-305-E – Request of the Office of Regulatory Staff for Rate Relief to South Carolina Electric & Gas Company's Rates Pursuant to S.C. Code Ann. § 58-27-920

Dear Ms. Boyd:

On December 3, 2018, the Public Service Commission of South Carolina (“Commission”) issued a Hearing Officer Directive, Order No. 2018-183-H, which provided the parties an opportunity to file comments by December 10, 2018, regarding the proposed Settlement Agreement between South Carolina Electric & Gas Company (“SCE&G”), Dominion Energy, Inc. (“Dominion”)(collectively “Joint Applicants”) and the South Carolina Solar Business Alliance (“SCSBA”).

Please allow this letter to serve as the South Carolina Office of Regulatory Staff's ("ORS") comments.

The proposed Settlement Agreement is between the Joint Applicants and SCSBA. ORS is not a party or signatory to the proposed Settlement Agreement. Furthermore, the proposed Settlement Agreement assigns ORS significant responsibilities including, but not limited to, the following:

- Coordinate agreement and evaluation of alternative scenarios for modeling, during the annual Integrated Resource Plan ("IRP") process, between the intervenors and SCE&G;
- Select an outside consultant to audit SCE&G's load forecast, reserve margin, portfolio modeling for IRPs filed in 2020, 2021, and 2022;
- Submit an independent report to the PSC in 2020, 2021 and 2022;
- Choose and manage the work of an Independent Evaluator who is required to review the Request for Proposal ("RFP") and screening process for any new generation resources more than 75 MW through 2023;
- Review and comment on proposed RFP and bid instructions;
- Review and comment on proposed RFP evaluations prior to award;
- Review SCE&G confidential final bid evaluation criteria; and,
- Facilitate a stakeholder process to develop curtailment protocol, modify the South Carolina Interconnection Procedures and consider Purchase Power Agreement form changes.

The proposed Settlement Agreement contains a provision that requires Dominion to fund the outside consultant to audit SCE&G's load forecast, reserve margin, portfolio modeling for IRP's filled in 2020, 2021 and 2022 in an amount not to exceed \$250,000.

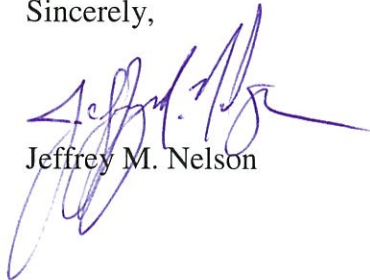
ORS's mission requires that it represent the concerns of the using and consuming public and preserve continued investment in and maintenance of utility facilities so as to provide reliable and high-quality utility services. ORS resources are allocated to ensure that these core mission objectives are met. If the proposed Settlement Agreement between the Joint Applicants and the SCSBA is approved by the Commission, ORS commits to make its best effort to assist the Joint Applicants and the SCSBA as ORS's resources allow.

ORS does not support the future allocation by to Ratepayers of the costs, fees or expenses for the outside consultant or the Independent Evaluator.

Letter – Jocelyn G. Boyd
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Thank you for allowing ORS to comment on the proposed Settlement Agreement.

Sincerely,



Jeffrey M. Nelson

cc: All Parties of Record in Docket 2017-207-E (via E-mail)
All Parties of Record in Docket 2017-305-E (via E-mail)
All Parties of Record in Docket 2017-370-E (via E-mail)
Joseph Melchers, Esquire (via E-mail)